

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BOARDS OF TRUSTEES OF THE CEMENT MASONS & PLASTERERS HEALTH & WELFARE TRUST, *et al.*,

Plaintiffs,

V.

KELAYE CONCRETE LLC, a
Washington limited liability company,
UBI No. 603213162, Contractor's
License No. KELAYCL876K2,

Defendant.

NO. 2:15-cv-01866-RAJ

**PLAINTIFFS' RESPONSE TO MINUTE
ORDER TO SHOW CAUSE AT DKT. 10**

In accordance with the Court’s Minute Order at Dkt. 10, Plaintiffs hereby file this response. This action was filed to compel an audit of Defendant Kelaye Concrete LLC’s (“Kelaye”) payroll records and to collect the outstanding contributions discovered in that audit. Plaintiffs have conducted its audit and received a copy of the final report on March 19, 2016.

**RESPONSE TO ORDER TO SHOW CAUSE –
Cause No. 2:15-cv-01866-RAJ - 1**

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McKENZIE ROTHWELL BARLOW
& COUGHRAN, P.S.
1325 FOURTH AVE., SUITE 910
SEATTLE, WA 98101
(206) 224-9900

1 Plaintiffs respectfully request that the Court extend the deadline to file a motion for
2 default judgment or other relief against the Defendant for an additional sixty days to Monday,
3 August 8, 2016.

4 Plaintiffs believe that this extension will be sufficient to either resolve its claims or
5 prepare its default judgment motion.

6 DATED this 26th day of May, 2016.

7 /s/ Noelle E. Dwarzski
8 Noelle E. Dwarzski, WSBA #40041
9 McKENZIE ROTHWELL BARLOW
& COUGHRAN, P.S.
10 Attorneys for Plaintiffs

11 **CERTIFICATE OF SERVICE**

12 I hereby certify under penalty of perjury under the laws of the State of Washington
13 that on this 26th day of May, 2016 I electronically filed the foregoing with the Clerk of the
14 Court using the CM/ECF system which will send notification to all parties registered with
CM/ECF in this matter. Defendant Kelye Concrete LLC has not appeared in this matter.

15 Dated this 26th day of May, 2016, at Seattle, Washington.

16 /s/ Noelle E. Dwarzski
17 Noelle E. Dwarzski, WSBA #40041
18 McKENZIE ROTHWELL BARLOW
& COUGHRAN, P.S.
19 Attorneys for Plaintiffs

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RESPONSE TO ORDER TO SHOW CAUSE –
Cause No. 2:15-cv-01866-RAJ - 2

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